

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : DATE FILED:

v. : CRIMINAL NO:

STEVEN ALLEN SCHWARTZ	:	VIOLATIONS:	18 U.S.C. §371
ILENE SCHWARTZ	:		(Conspiracy to
	:		commit bank and wire
	:		fraud and identity theft
	:		-1 count)
	:		18 U.S.C. §1343
	:		(Wire fraud-6 counts)
	:		18 U.S.C. §1344
	:		(Bank fraud-9 counts)
	:		18 U.S.C. §1028(a)(7)
	:		(Identity Theft-6 counts)
	:		18 U.S.C. §1342
	:		(Use of fictitious name for mailing-5
	:		counts)
	:		18 U.S.C. §2
	:		(Aiding and Abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

INTRODUCTION

1. At all times material to this indictment:

a. Defendant STEVEN ALLEN SCHWARTZ and his mother, defendant ILENE SCHWARTZ, resided at 13 Melissa Way, Plymouth Meeting, Pennsylvania.

b. Defendant STEVEN ALLEN SCHWARTZ held himself out as an investment advisor, and conducted his businesses at times through various entities, including but not limited to: 21st Limited, The Yorkshire Group, Bamm, Inc., Pinnacle Investments, TC Communications, Invest Tech, China Tech, and Secura Capital. Defendant ILENE SCHWARTZ

assisted STEVEN ALLEN SCHWARTZ in running these entities by being an officer for some, and by opening, conducting transactions in, and closing brokerage and bank accounts for some.

c. Defendant STEVEN ALLEN SCHWARTZ represented himself to potential investors as “the trader Wall Street fears the most” due to his claimed phenomenal success in the stock market. He further represented to potential investors in written documents that “[t]here is no money manager in the United States that has the proven track record that Mr. Schwartz has amassed over his career.”

d. Defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ conducted business out of their residence in Plymouth Meeting, Pennsylvania.

2. The following banks were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”): Artisan’s Savings Bank, Beneficial Savings Bank, Madison Bank, Mellon Bank, National Penn Bank of Boyertown, Commerce Bank, Commonwealth Bank, First Republic Bank of Delaware, Fleet Bank, PNC Bank, Progress Bank, Summit Bank, Westminster Bank, and Wells Fargo Bank.

THE CONSPIRACY TO DEFRAUD

3. From in or about 1997 to the date of this indictment, defendants

STEVEN ALLEN SCHWARTZ and
ILENE SCHWARTZ

conspired and agreed with each other and persons known and unknown to the grand jury to commit offenses against the United States, that is, to: (1) knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce writings, signs, and signals for the purpose of executing a scheme to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations and promises, in violation of Title 18, United

States Code, Section 1343; (2) knowingly execute a scheme to defraud and to obtain money and funds belonging to and under the custody and control of PNC Bank, Commerce Bank, Fleet Bank, and Commonwealth Bank, Wells Fargo Bank, and Westminster Bank, by means of false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344, and (3) knowingly use, without lawful authority, the names and social security numbers of other individuals in order to commit and aid and abet wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1028(a)(7).

MANNER AND MEANS

It was part of the scheme that:

4. Defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ obtained approximately \$700,000 from numerous victims by falsely representing to them that their funds were being invested in the stock market and the commodities markets through entities controlled by defendant STEVEN ALLEN SCHWARTZ, and by falsely promising rapid and substantial profits from those investments when, in fact, the defendants did not invest the funds as promised but instead used the money to (a) repay previous victims, (b) pay for the defendants' personal expenses, and (c) gamble in Las Vegas, Nevada and elsewhere.

5. Defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ repeatedly gave victims false reports of profits in person, by mail, by telephone, and by facsimile in order to convince them to invest more money, and to refer their friends and co-workers to STEVEN ALLEN SCHWARTZ as potential investors.

6. Defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ gave victims false excuses for their inability (a) to forward accumulated profits they had falsely

represented had been earned, (b) to return invested funds, and (c) to provide an accurate accounting of what investments had been made with the victims' money.

7. When victims complained about the failure of the defendants to provide an accounting for their investments and requested a return of investment principal and profits, defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ, and others at their direction, would engage in verbal and written intimidation by, among other things, incessantly telephoning the victims, their family members and employers, sending faxes and letters to the victims threatening legal action, and filing bogus complaints with various professional licensing boards against the victims and their attorneys.

8. Defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ, and others at their direction, wrote checks on accounts which the defendants presented and caused to be presented for payment at various financial institutions, knowing that the accounts at that time held insufficient funds for the written checks.

9. Defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ opened banking and brokerage accounts in the names of other persons, and used the social security numbers of other persons, without the consent of those persons, often incurring negative balances which then were attributed to those persons, damaging their credit ratings and reputations.

10. Defendant STEVEN ALLEN SCHWARTZ hid his control of bank and brokerage accounts by opening some accounts in the name of his assistant A.T., and conducted bank and brokerage transactions through those accounts, including, but not limited to accounts at Beneficial Savings Bank, Progress Bank, PNC Brokerage, Accutrade Securities, and Quick and Reilly.

OVERT ACTS

_____ In furtherance of the conspiracy, defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

WIRE FRAUD

1. On or about February 3, 1999, defendant STEVEN ALLEN SCHWARTZ caused Dr. M.D. to give him a check for \$10,000 to invest, which SCHWARTZ then deposited on or about February 23, 1999 to an account at National Penn Bank of Boyerstown in the name of 21st Limited. On or about March 3, 1999, defendant STEVEN ALLEN SCHWARTZ caused \$7,500 of that amount to be wire transferred to another account at National Penn Bank in the name of Yorkshire Group as overdraft protection.

2. On or about January 22, 1999, defendant STEVEN ALLEN SCHWARTZ forged the signature of L.K. on a document ordering the wire transfer of \$96,551.80 from Legg Mason account number 405-74251-10 to his account at National Penn Bank, account number 8061-774-3, in the name of 21st Limited, one of STEVEN ALLEN SCHWARTZ' companies.

3. In or about September 1997, defendant STEVEN ALLEN SCHWARTZ caused B.S. to give him \$8,000 to invest.

4. On or about December 13, 1999, defendant STEVEN ALLEN SCHWARTZ caused A.W. to wire transfer \$130,000 to invest.

5. In or about May 2000 defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ wire transferred approximately \$105,045 of A.W.'s investment funds to the Barbary Coast Casino where STEVEN ALLEN SCHWARTZ used it to gamble.

BANK FRAUD

6. On about June 30, 1997 defendant STEVEN ALLEN SCHWARTZ wrote a check payable to his company Pinnacle Investments, in the amount of \$16,000 on the closed checking account of P.D., forged P.D.'s signature, and then deposited the check for payment on the same day at PNC Bank, account number 85-0197-1629, knowing that P.D.'s account was closed, and that the check was worthless.

7. On or about July 2, 2002, defendant STEVEN ALLEN SCHWARTZ wrote a check for \$95,000, drawn on a checking account he had opened on or about July 1, 2002, at Wells Fargo Bank with a single deposit of \$100, and then deposited the \$95,000 Wells Fargo check at Fleet Bank, account number 9419228473, knowing that there were insufficient funds in the Wells Fargo account to cover the amount of the check.

8. On or about August 30, 2002, defendant STEVEN ALLEN SCHWARTZ obtained a cashier's check in the amount of \$44,000 from Commonwealth Bank, knowing that he had insufficient funds on deposit to cover payment for the cashier's check.

USE OF FALSE IDENTITIES

9. On or about August 29, 1997, defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ used the name and social security number, and forged the signature of R.S., a childhood friend of defendant STEVEN ALLEN SCHWARTZ, without the consent of R.S., to open a brokerage account at Rosenthal Collins Group, in the name of R.S.

10. On or about May 13, 1997, defendant STEVEN ALLEN SCHWARTZ used the name and social security number, and forged the signature of B.S., without the consent of B.S., to open a brokerage account at Olde Discount Brokerage, in the name of B.S.

11. On or about August 11, 1999, defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ used the name and social security number, and forged the signature of P.D., the former fiancée of STEVEN ALLEN SCHWARTZ, in an attempt to open a brokerage account at Ameritrade in the names of ILENE SCHWARTZ and P.D.

12. On or about September 8, 1999, defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ used the name of P.D. and forged the signature of P.D. in an attempt to open a brokerage account at PNC Brokerage in the names of A.T. and P.D.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 2 and 4 through 10 of Count One are realleged here.

THE SCHEME

2. From in or about 1997 to the date of this indictment, defendant

STEVEN ALLEN SCHWARTZ

devised and intended to devise a scheme to defraud various individuals and financial institutions, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

3. In or about 1998, defendant STEVEN ALLEN SCHWARTZ induced L.K. to provide him with funds to be invested by the defendant in commodities and stocks. Between in or about October 1998 and in or about August 1999, the defendant caused L.K. to invest approximately \$300,000 with him by promising huge profits. During that time, to entice L.K. to continue to invest more money with him, the defendant provided monthly payments of approximately \$15,000 to L.K. which he represented to be profits from L.K.'s investments, but were in reality monies obtained from other investors.

4. On or about January 22, 1999, defendant STEVEN ALLEN SCHWARTZ forged and caused to be forged L.K.'s signature on wire transfer instructions for the transfer of \$96,551.80 from a Legg Mason account in the name of L.K. to an account which the defendant maintained in the name of 21st Limited at the National Penn Bank

5. On or about January 26, 1999, defendant STEVEN ALLEN SCHWARTZ caused

\$96,580 to be transferred from the 21st Limited account at National Penn Bank to another account maintained by the defendant at National Penn Bank in the name of Yorkshire Group, from which defendant STEVEN ALLEN SCHWARTZ transferred the funds to additional accounts and used the funds to pay personal expenses.

6. On or about January 22, 1999, in the Eastern District of Pennsylvania and elsewhere, defendant

STEVEN ALLEN SCHWARTZ,

for the purpose of executing the scheme, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the writings, signs, signals, pictures and sounds described below:

TRANSFER

TO

Wire transfer of \$96,551,80
from Legg Mason account
405-74251 in the name of
L.K. originating from
Chicago, IL

21st Limited
National Penn Bank of Boyertown, PA
Account Number 8061-774-3

In violation of Title 18, United States Code, Section 1343.

COUNTS THREE THROUGH SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 2 and 4 through 10 of Count One are realleged here.

THE SCHEME

2. From in or about 1997 through the date of this indictment, defendants

STEVEN ALLEN SCHWARTZ and
ILENE SCHWARTZ

devised and intended to devise a scheme to defraud various individuals and financial institutions, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

3. In or about December 1999, the defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ promised A.W. that they would invest any money he provided to them in the stock and commodities markets, and promised A.W. large profits on his investments.

4. Consequently, between on or about December 13, 1999 and in or about June 2000, A.W. wire transferred approximately \$500,000 to an account at Artisan's Bank controlled by the defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ, which monies the defendants promised to invest in their company, 21st Limited.

5. However, after receiving each wire transfer from A.W., the defendants STEVEN ALLEN SCHWARTZ and ILENE SCHWARTZ immediately transferred A.W.'s money to another account maintained by them at Artisan's Bank, in the name of BAMM, Inc., a company unknown to A.W.

6. After transferring A.W.'s money to the BAMM, Inc. account, the defendants then

wire transferred the money to a brokerage account maintained by them in the name of BAMM, Inc. at Weiss, Peck, and Greer. On or about December 13, 1999, when the defendants transferred the first of A.W.'s \$130,000 to Weiss, Peck, and Greer, the account balance was \$422.85, and no significant deposits were made to the Weiss, Peck and Greer account from on or about December 13, 1999 through in or about June 2000 other than monies which originated from A.W.

7. The defendants then placed stock trades using A.W.'s money, at times running the account into a negative balance of over \$1,000,000.

8. The defendants converted A.W.'s money to their own use by transferring money back from Weiss, Peck and Greer to the Artisan's Bank account in the name of BAMM, Inc., and then wire-transferring approximately \$100,000 of A.W.'s money to Las Vegas for their personal use, as detailed below.

9. On or about the dates described below, in the Eastern District of Pennsylvania and elsewhere, defendants,

STEVEN ALLEN SCHWARTZ and
ILENE SCHWARTZ,

for the purpose of executing the scheme, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce, instructions sent by the defendants by facsimile transmissions to Artisan's Bank in Delaware, originating from their residence in the Eastern District of Pennsylvania, the writings, signs, signals, pictures and sounds described below, each transmission being a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE COMMUNICATION</u>	<u>TO</u>
3.	5/12/00	Instructions sent by fax	Barbary Coast Casino

		ordering the wire transfer of \$25,015 from Artisan's Bank, account number 06-37-3216	Las Vegas, NV
4 .	5/18/00	Instructions sent by fax ordering the wire transfer of \$20,000 from Artisan's Bank account number 06-37-3216	Barbary Coast Casino Las Vegas, NV
5.	5/22/00	Instructions sent by fax ordering the wire transfer of \$5,015 from Artisan's Bank account number 06-37-3216	Barbary Coast Casino Las Vegas, NV
6.	5/23/00	Instructions sent by fax ordering the wire transfer of \$35,000 from Artisan's Bank account number 06-37-3216	Barbary Coast Casino Las Vegas, NV
7.	6/7/00	Instructions sent by fax ordering the wire transfer of \$20,015 from Artisan's Bank account number 06-37-3216	Barbary Coast Casino Las Vegas, NV

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS EIGHT THROUGH SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 2 and 4 through 10 of Count One are realleged here.
2. Defendant STEVEN ALLEN SCHWARTZ has known P.D. since approximately 1990, and visited P.D. at her home where she maintained a supply of blank checks drawn on various financial institutions including Westminster Bank.
3. P.D. had no open account at Westminster Bank in 1997, but on many occasions prior to that time, defendant STEVEN ALLEN SCHWARTZ had visited her home. At no time did P.D. give the defendant permission to take any of her blank checks, or to sign her name on any checks from Westminster Bank on her behalf.
4. On or about various occasions as detailed below, defendant STEVEN ALLEN SCHWARTZ forged, and caused to be forged, the signature of P.D. on three checks drawn on Westminster Bank in the name of P.D., which were then deposited to accounts maintained in the names of his companies, Pinnacle Investments and TC Communications in or about June and September 1997.
5. On or about July 1, 2002, defendant STEVEN ALLEN SCHWARTZ opened a checking account at Wells Fargo Bank at the Airport Branch in Las Vegas, Nevada in the name of his company, Secura Capital, with himself as the signatory on the account. That account was closed on or about July 31, 2002, and at no time had more than the \$100 initial deposit available for withdrawal.
6. From on or about July 1, 2002 through on or about July 31, 2002, defendant STEVEN ALLEN SCHWARTZ maintained a checking account at Fleet Bank. During that

period, no more than \$15,015.43 was ever actually on deposit in the Fleet Bank account.

However, on or about July 2, 3 and 8, 2002, as detailed below, the defendant deposited three checks drawn on his Wells Fargo Bank account into the Fleet Bank account, which checks were initially credited as deposits by Fleet Bank, but were subsequently deducted when Wells Fargo Bank returned them for insufficient funds. Despite this, the defendant wrote and presented a check for \$85,000 for payment on or about July 8, 2002, to Fleet Bank, drawn on the Fleet Bank account, which was paid by Fleet Bank based upon the defendant's prior deposits of the worthless Wells Fargo checks.

7. On or about the dates described below, in the Eastern District of Pennsylvania and elsewhere, defendant

STEVEN ALLEN SCHWARTZ

knowingly executed and attempted to execute a scheme to defraud the below listed banks and to obtain monies owned by and under the custody and control of the below listed banks by means of false and fraudulent pretenses, representations and promises:

COUNT	DATE	FROM	TO	AMOUNT	FALSE REPRESENTATION
8.	6/30/97	Westminster Bank, checking account number 54157493000, closed account of P.D.	Pinnacle Investments	\$16,000	Steven Schwartz forged P.D.'s signature and deposited the check to PNC Bank, account number 85-0197-1629, account name "Pinnacle Investments"
9.	6/30/97	Westminster Bank, checking account number 54157493000, closed account of P.D.	TC Communications	\$16,000	Steven Schwartz forged P.D.'s signature and deposited the check to Commerce Bank account number 360187561, account name, "TC Communications"
10.	9/25/97	Westminster Bank, checking account number 54157493000, closed account of P.D.	TC Communications	\$10,000	Steven Schwartz forged P.D.'s signature and deposited the check to Commerce Bank, account number 360187561, account name "TC Communications"

COUNT	DATE	FROM	TO	AMOUNT	FALSE REPRESENTATION
11.	7/2/02	Wells Fargo Fargo Bank, account number 971374251	Secura Capital	\$95,000	Steven Schwartz knew that he only had \$100 on deposit at Wells Fargo, and deposited the check to Fleet Bank, account number 9419228473, account name, "Secura Capital"
12.	7/3/02	Wells Fargo Bank account number 971374251	Secura Capital	\$75,000	Steven Schwartz knew that he only \$100 on deposit at Wells Fargo, and deposited the check to Fleet Bank account number, 9419228473, account name, "Secura Capital"
13.	7/8/02	Wells Fargo Bank account number 374251	Secura Capital	\$90,000	Steven Schwartz knew that he only had \$100 on deposit at Wells Fargo, and deposited the check to Fleet Bank, account number 9419228473, account name, "Secura Capital"

COUNT	DATE	FROM	TO	AMOUNT	FALSE REPRESENTATION
14.	7/6/02	Fleet Bank account number 9228473, account name, "Secura Capital"	"Cash"	\$85,000	Steven Schwartz knew that there were insufficient funds to cover the check, and presented it for "Cash" at Fleet Bank
15.	8/25/02	Wells Fargo Bank account number 9717374251	Secura Capital	\$45,000	Steven Schwartz knew that he only \$100 on deposit with Wells Fargo, and he deposited the check to Commonwealth Bank, account number 6254001156, account name, "Secura Capital"
16.	8/30/02	Common- Wealth Bank, account number 6254001156	Steve Schwartz	\$44,000	Steven Schwartz knew that he did not have sufficient funds on deposit to cover the cashier's check

All in violation of Title 18, United States Code, Section 1344.

COUNTS SEVENTEEN THROUGH TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 2 and 4 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

STEVEN ALLEN SCHWARTZ

knowingly used, in and affecting interstate commerce, without lawful authority, the name and social security number of R.S., a friend of STEVEN ALLEN SCHWARTZ, to open and maintain accounts in the name of R.S., without the knowledge or permission of R.S., with the intent to commit, and to aid and abet unlawful activity that constituted a violation of federal law, that is wire fraud and bank fraud as charged in this indictment:

<u>COUNT</u>	<u>ACCOUNT NAME</u>	<u>DATES ACCOUNT MAINTAINED</u>
17.	ED & F Man International Brokerage Account Number 29529522, in the name of R.S.	December 1996-December 2000
18.	Rosenthal Collins Group Brokerage Account Number 14-10034, in the name of R.S.	August 1996-January 1999
19.	Saul Stone and Company Brokerage Account Number FD010 18210, in the name of R.S.	March 1996-June 2000

<u>COUNT</u>	<u>ACCOUNT NAME</u>	<u>DATES ACCOUNT MAINTAINED</u>
20.	Iowa Grain Account Number 90435, in the name of R.S.	July 1996-September 1999

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNTS TWENTY-ONE THROUGH TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 2 and 4 through 10 of Count One are realleged here.
2. In or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

STEVEN ALLEN SCHWARTZ

knowingly used, in and affecting interstate commerce, without lawful authority, the name and social security number of B.S., to open and maintain accounts in the name of B.S., without the knowledge or permission of B.S., with the intent to commit, and to aid and abet unlawful activity that constituted a violation of federal law, that is wire fraud and bank fraud, as charged in this indictment:

<u>COUNT</u>	<u>ACCOUNT NAME</u>	<u>DATES ACCOUNT MAINTAINED</u>
21.	Olde Discount Brokerage Account Number 037 11764 FUG, in the name of B.S.	May 1997-December 1998
22.	T.D. Waterhouse Brokerage Account Number 340- 32634-1-5, in the name of B.S.	May 1997-January 2000

All in violation of Title 18, United States Code, Section 1028(a)(7).

COUNTS TWENTY-THREE THROUGH TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 2 and 4 through 10 of Count One are realleged herein.
2. From in or about 1997 up to the date of this indictment, defendants

STEVEN ALLEN SCHWARTZ and
ILENE SCHWARTZ

devised and intended to devise a scheme to defraud various individuals and financial institutions of money and property by means of false and fraudulent pretenses, representations, and promises.

3. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

STEVEN ALLEN SCHWARTZ and
ILENE SCHWARTZ,

having devised and intending to devise the scheme, and for the purpose of conducting, promoting and carrying on this scheme by means of the Postal Service, used, assumed, and requested to be addressed by fictitious, false, and assumed names and addresses other than their own proper names and addresses, that is the names and addresses for accounts as described below, each instance constituting a separate count:

<u>COUNT</u>	<u>DATES</u>	<u>NAME(S) USED</u>	<u>ADDRESS USED</u>	<u>ACCOUNT</u>
23.	1997-2000	R.S.	13 Melissa Way P.O. Box 557 Plymouth Meeting, PA 19462	Checking account number 86-1006 5692, PNC Bank

<u>COUNT</u>	<u>DATES</u>	<u>NAME(S) USED</u>	<u>ADDRESS USED</u>	<u>ACCOUNT</u>
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24.	1996-1998	R.S.	1324 DeKalb Pike, Box 5097, Centre Square, PA 19422	Rosenthal Collins Brokerage account number 14-10034
25.	1999	A.T. P.D.	13 Melissa Way PO Box 557 Plymouth Meeting, PA 19462	PNC Brokerage account number 8263-4128
26.	August 1999	P.D.	13 Melissa Way P.O Box 557 Plymouth Meeting PA 19462	Ameritrade Brokerage account number 173065970
27.	January 1998	B.S.	TA Pinnacle PO Box 557 Plymouth Meeting, PA 19462-0557	Bell Telephone billing account for telephone number (610) 940- 3800

All in violation of Title 18, United States Code, Section 1342.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney